

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

Introduction:

Panama Petrochem Limited is committed to carrying out all its business activities in complete fairness, transparency, integrity and accountability in all its undertakings. We strive to attain our mission through compliance with highest legal and ethical standards. We have zero tolerance to any form of bribery, embezzlements or corruption and prohibit improper payments, gifts or inducements of any kind to or from any person.

This policy establishes the principles for the organization at large, with respect to applicable anti-bribery and anti-corruption laws.

Additionally, this policy provides information and guidance on how to deal with bribery and corruption issues within the establishment.

It directs us to act professionally, fairly and with utmost integrity in all our business activities, wherever we operate.

Purpose:

The purpose of this policy is to ensure that our company sets up adequate procedures in order to prevent involvement in any activity relating to bribery or corruption either intentionally or un-intentionally. It makes it obligatory on all the individuals associated with the organisation in any form, to recognize questionable transactions, behaviour or conduct and to take steps to record, comply and follow procedures set in place to deal with such behaviour or conduct.

Scope:

This policy applies to all units, plants and offices covered in the ambit of the Company. It binds all the officers, directors, managers, employees, workers whether permanent or temporary, either employed directly or indirectly, suppliers, partners and all other individuals acting on behalf of the Company, irrespective of their location. All individuals associated with the Company must report any breach of this policy, principles, standards or any law effective for the time being in force. And such breach will be regarded as a serious matter by the Company which will result in a disciplinary action thereupon.

Prohibited Activities:

1. It is prohibited for any staff or individual acting on behalf of the Company to either directly or indirectly offer, give, request or accept any bribe, to or from any person or Company in order to gain commercial, contractual or regulatory advantage either for the company or for personal advantage.
2. This policy requires all individuals representing the Company:
 - Not to offer or accept, promise or make any bribe or unauthorised payment of any kind to and from anyone;
 - Not to solicit business by offering/accepting, promising or making any bribe or unofficial payment to suppliers and vice versa;
 - Not to request or accept any kind of bribe or unusual payment or inducement that is not authorised in the ordinary course of business;

Gifts and Hospitality:

Giving and receiving of gifts and hospitality without any mala-fide intentions, or where nothing is expected in return, which helps form positive relationships with third parties and where such activities are appropriately recorded, shall not constitute bribery and consequently such actions shall not result into a breach of this policy. Additionally, *following conditions should be satisfied:*

- a. The gifts offered or accepted should be within the range of normal social courtesies;
- b. The intention should be pure and not of gaining any improper business or personal advantage.
- c. The expenses and other requisite details of such gestures should be correctly and appropriately recorded.
- d. Such actions should not violate the anti-bribery laws prevailing in the country for the time being in force and should not be inconsistent with the principles of this policy.

Raising a Concern

If an employee or an individual acting on behalf of the Company is offered a bribe, or has knowledge of any bribe that is solicited from an individual representing the Company, they should at first instance draft a formal written report intimating to their departmental head at the earliest.

If any Unit/Departmental in-Charge is involved in such an act, the individual may approach the members of the senior management for reporting the case and likewise if the concerned member of the senior management is involved in such an act, the information of the same may directly be made to the Chairman of the Company.

All Employees or individuals representing the Company are encouraged to raise concerns about any instance of bribery or corruption at the earliest possible stage with no fear and with complete confidence. All reports raised shall be taken seriously and, appropriately investigated.

If any instance of bribery or corruption is identified remedial steps shall immediately be implemented. The reported member of the Company shall be investigated for violation including financial irregularities, corruption, fraud or embezzlement. If the charges after being given a fair opportunity of being heard is proved to be true, the delinquent may be awarded penalties depending on the gravity of the misconduct with no prejudice and in all fairness showing no bias.

However, upon investigation if the acquisitions are found to be false and to be made purely with an intention to cause harm, appropriate actions shall be taken against the person making such false reports.

Review and Amendment:

The Board may, at its discretion, from time to time, make amendments to this Policy to the extent required to be in line with applicable laws and regulations or as deemed fit.

In case of any inconsistency between the Policy and the law for time being in force, the law shall prevail over the Policy.